

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION**

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**UNITED STATES OF AMERICA**

**v.**

**(12) CORVAIN T. COOPER, a/k/a “CV”**

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**Docket No. 3:11-cr-337-RJC**

**GOVERNMENT’S RESPONSE**  
**IN OPPOSITION TO**  
**DEFENDANT’S MOTION *IN***  
***LIMINE* REGARDING BANK**  
**RECORDS**

NOW COMES the United States of America, by and through Anne M. Tompkins, United States Attorney for the Western District of North Carolina, and files this Response in Opposition to Defendant Corvain T. Cooper’s motion *in limine* regarding his own bank records (Document 328), as follows:

As the Defendant’s Motion acknowledges, the United States has provided in discovery the certified bank records in question. That counsel was unable to independently obtain those same records is of no moment.

The banking records are vital evidence of the conspiracy charged in the bill of indictment. They are not evidence of “other bad acts”; rather, they are evidence of the money laundering conspiracy, which spanned from at least as early as 2005 and continued throughout the conspiracy period. Once Defendant Cooper ceased funneling drug proceeds through the bank accounts in question in or about 2007, he recruited and utilized co-conspirators, including among others, co-defendants LaChapelle and Wade, to launder the drug proceeds through their accounts. In total, the trial defendants conducted structured deposits and withdrawals totaling approximately \$2 million of drug proceeds.

We note that the United States has given notice pursuant to Federal Rules of Evidence 1006 that we will be presenting summary exhibits of the banking transactions at trial, and merely marking the actual certified banking records, voluminous as they are, as exhibits for identification purposes.<sup>1</sup>

Respectfully submitted this 2<sup>nd</sup> day of October 2013.

ANNE M. TOMPKINS  
UNITED STATES ATTORNEY

/s/ Steven R. Kaufman  
STEVEN R. KAUFMAN  
ASSISTANT UNITED STATES ATTORNEY  
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(704) 338-3117 (office); (704) 227-0254 (facsimile)

**CERTIFICATE OF SERVICE**

I hereby certify that on this 2<sup>nd</sup> day of October 2013, the foregoing was duly served upon the defendants herein through defendants' attorneys of record via electronic filing:

Dianne Kathryn Jones McVay, Esq.

/s/ Steven R. Kaufman  
STEVEN R. KAUFMAN  
ASSISTANT UNITED STATES ATTORNEY

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<sup>1</sup> Where relevant to a particular issue, we will also be admitting specific select pages from the thousands of pages of bank records.